

# Oklahoma Department of Environmental Quality Public Water Supply Compliance Tracking Section

## Corrective Action Plan from August 2011 File Review

Associated Rule	Planned Corrective Action	Timeframe for Completion	Update Information	Completion Determined by	Status
Sanitary Survey	Add pump questions to electronic survey form	1-6 months	Pump related questions have been added to the electronic form and those answers are being migrated into SDWIS	ODEQ will provide both an example of the Sanitary Survey form and screenshot of the data migrated into SDWIS	Done Documentation provided 07/20/12
Sanitary Survey	Consider SDWIS 3.01 which may handle partial surveys	12-36 months	Based on EPA Region 6's current work with SDWIS 3.1, ODEQ would see an increased burden in TCR Compliance Determinations due to SDWIS 3.1 configuration for TCR/GWR compliance. Given that ODEQ does not currently have primacy for the GWR, moving to SDWIS3.1 for the ease of grouping partial Sanitary Surveys does not outweigh the additional work it would create for TCR.		Not feasible ODEQ has moved to the most recent version SDWIS, however the reprogram of the electronic Survey report would be labor intensive and not yield a sizable difference.
CCR	Assign Content Violations	12-36 months	Current staff levels do not provide sufficient man-hours to complete this task		Pending-Check back in 3 to 6 months (Sept or Dec 2015) CCR coordinator hired in October 2014.

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CCR	Assign Submittal Violations	1-6 months	Compliance schedules have been entered into SDWIS for the 2012 reporting period for 2011 CCRs. Informal violation letters have been sent to PWSs for failure to submit during the 2011 reporting period. Starting the week of July 9, NOVs will be sent for these 2011 non-submissions. Compliance determination for 2012 will take place after the October 1 certification due date.	EPA Region 6 will check in ODEQ's SDIWS to see that CCR violations were in fact issued for the 2012 reporting period. One hundred and twenty-two violations (type 71) migrated into SDWIS on 6/14/12.	Done Documentation provided 07/20/12
TCR	For populations >4900 spread samples thought-out the month	1-6 months	Based on the higher priority of having compliance determinations conducted in a timely manner and the associated enforcement action taken, this task has yet to be evaluated.		Updated 10/10/12 Pending EPA Region 6 will help develop queries

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TCR	PWSs that report late should receive M/R Violations	12-36 months	Currently a goal has been established to conduct compliance by the 11th of the next month. Work needs to be done to educate the labs about the need to have all sampling events completed by the 10th (Reject/repeating sampling addressed by the 10th as well). Staff is working on establishing policy to issue NOV's for PWSs who receive 2 consecutive M/R violations	Currently, there is no way to distinguish failure to monitor and failure to report in SDWIS. ODEQ would prefer to wait and see if SDWIS NextGen supports that distinction. If so we will consider it at that time.	Task on hold-Waiting for Prime And lab reporting mechanisms for timely reporting  *RTCR will allow for detailed information M and/or R violations.
Phase II/V	Submit Waiver application to EPA	1-6 months	Task completed on 2/15/2012	EPA Region 6 received and approved ODEQ's Phase II/V Waiver Program	DONE
DBPR	Distribution system chlorine residual tracking and assign violations	6-12 months	Based on higher priority items, this item has yet to be evaluated		Re-evaluated in September  DBP Coordinator conducted outreach to labs and PWS. Compliance determinations will start in August for July data.
DBPR	Results averages should be updated in SDWIS when automatic calculations are incorrect		Follow up with staff is needed to verify that the corrections are being done	Changes made in both SDWIS\State coding and ODEQ's data.	Done

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Radionuclides	Improve data quality by removing blank result rows		Data as of 2QT2011 is being accurately migrated into SDWIS and no issues with compliance determination have been found. Data between 1QT2011 and 3QT2010 has also been cleaned up and appropriate violations issued. Data quality issues remain for data occurring prior to 3QT2010. This data will be addressed on an "as found" basis. Any resulting violations will be rejected with comments.	Policy created to accept the bad data in SDWIS.	DONE
LCR	90th percentiles must be calculated. Update SDWIS when automatic calculations are incorrect		Staff has been correcting 90th percentile exceedances.	Attached is a spreadsheet showing the updated timestamps and initial timestamps for those 90 <sup>th</sup> percentile that we've updated.	DONE Documentation provided 07/20/12
SWTRs	M/R violations should be assigned for missing and late reporting	12-36 months	Current staff levels do not provide sufficient man-hours to complete this task		

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SWTRs	EWSTR analyte code should be changed from 100 to 300	6-12 months		EPA Region 6 will plan on visiting with Steven Wright to correct SDWIS issues. <u>Update</u> EPA Traveled to ODEQ to work on Sept 26-27, 2012	Updated 09/26/12 Done EPA region 6 staff worked with ODEQ staff to address the analyte coding. SDWIS\FedRep corrects the 100/300 reporting issue and therefore is neither an issue nor a discrepancy.
PN	Assign public notice violations	6-12 months	Currently working on policy with legal on how to address violations that have been RTCed but yet the PN requirements remain open.		Pending
SWTR	Address Groundwater systems that have a SWTR Monthly Combined Filter Effluent FANL	EPA Staff Travel Schedule	eDV results show over 1,000 violations for Analyte 0999 being associated to GW PWSs under a SWTR Monthly Combined Filter Effluent	EPA Region 6 will plan on visiting with Steven Wright to correct SDWIS issues. <u>Update</u> EPA Traveled to ODEQ to work on Sept 26-27, 2012	Updated 09/26/12 Done EPA Region 6 staff developed scripts to remove the incorrect FANL assignments.
PbCu	Monitoring Period Averages not being calculated	EPA Staff Travel Schedule	Previous versions of SDWIS\State allowed for Monitoring period averages to be calculated based on report results. Averages are no longer being calculated.	Part of EPA SDWIS Improvement Travel <u>Update</u> EPA Traveled to ODEQ to work on Sept 26-27, 2012	Updated 09/26/12 Done Dianna Heaberlin, SAIC, confirmed that this option is no longer available with SDWIS 2.3. Steven will need to develop queries if ODEQ wishes to continue using this calculation.

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TOC Removal for Qrtly GUDI PWSs	Results Averages not being calculated	EPA Staff Travel Schedule	TOC Qrtly Result averages for GUDI PWSs is not being calculated	Part of EPA SDWIS Improvement Travel <u>Update</u> EPA Traveled to ODEQ to work on Sept 26-27, 2012	Updates 09/26/12 Done Once again Dianna Heaberlin, SAIC, helped with completing this action. IE browsers should have the compatibility option enabled for SDWIS\State. This option allows SDWIS to capture the data in a specific way. Also ODEQ was in need of packaging the treatment with results in order to have averages to be calculated.